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Attorneys for Defendant  
TIJUANA, LLC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RUDI JIMENEZ,

Plaintiff,

vs.

TIJUANA, LLC, d/b/a ADVANCE MEDICAL  
STAFFING, d/b/a RAPID TEMPS, INC., a  
domestic limited liability company; DOES I-X;  
and ROE BUSINESS ENTITIES I-X,  
inclusive,

Defendants.

Case No.: 2:20-cv-00765-RFB-VCF

**JOINT STIPULATION FOR DISMISSAL  
OF ACTION WITH PREJUDICE AND  
[PROPOSED] ORDER**

Defendant TIJUANA, LLC d/b/a ADVANCE MEDICAL STAFFING (“Defendant”),  
improperly named as TIJUANA, LLC, d/b/a ADVANCE MEDICAL STAFFING, d/b/a RAPID  
TEMPS, INC., (“Tijuana” or “Defendant”), by and through its counsel of record, Jackson Lewis  
P.C., and Plaintiff RUDI JIMENEZ (“Plaintiff”), by her counsel of record, Maier Gutierrez &  
Associates, pursuant to Fed. R. Civ. P. Rule 41(a)(1)(A)(ii) hereby stipulate to the Dismissal With

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Prejudice of this action, including all claims herein against all parties, with each party to bear its own attorney's fees and costs.

Dated this 8<sup>th</sup> day of October, 2020

MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

/s/ Danielle J. Barraza

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Attorney for Plaintiff

/s/ Lynne K. McChrystal

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Attorneys for Defendant

**ORDER**

**IT IS HEREBY ORDERED** that this action is Dismissed With Prejudice on this \_\_\_\_\_ day of October, 2020.



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

4827-9579-6941, v. 1

DATED this 9th day of October, 2020.